



U.S. Department
of Transportation

**Pipeline and
Hazardous Materials Safety
Administration**

8701 South Gessner, Suite 1110
Houston, TX 77074

NOTICE OF AMENDMENT

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 27, 2012

Mr. Kevin Bodenhamer
Senior Vice President
Enterprise Products Operating, LLC
1100 Louisiana Street
Houston, TX 77002-5227

CPF 4-2012-5025M

Dear Mr. Bodenhamer:

On June 13, 2012, a representative of the Pipeline and Hazardous Materials Safety Administration (PHMSA) pursuant to Chapter 601 of 49 United States Code reviewed Enterprise Products Operating, LLC (Enterprise) procedures as part of a review associated with compliance requirements for Safety Order CPF-4-2001-5015S. The review was in order to evaluate a request to return the pipeline associated with the Safety Order back to its original operating pressure.

On the basis of the review, PHMSA has identified the apparent inadequacy found within Enterprise's plans or procedures, as described below:

1. **195.402 Procedural manual for operations, maintenance, and emergencies.**
 - (a) **General.** Each operator shall prepare and follow for each pipeline system a manual of written procedures for conducting normal operations and maintenance activities and handling abnormal operations and emergencies.

Enterprise Products Procedure, Pipeline Hydrostatic Testing Std.4507, Revision No. 2.0, November 2011, provides detailed directions for conducting a hydrostatic test. Section 6.7 Temperature Recorder requires that "a temperature recorder shall be used to maintain a continuous record of the pipe temperature versus time during testing." The procedure does not require the operator to in any way attempt to ensure that the temperature information collected

reflects the temperature of the water in the pipe, which is the desired measurement as is specified by 195.310 Records (b)(10) which requires that the operator records and collects the "Temperature of the test medium or pipe during the test period." In the associated review, Enterprise did not bury the temperature probe and thus left it exposed to the atmosphere not allowing the probe to accurately reflect the temperature of the water in the pipe. Thus Enterprise was not able to prove the temperature measurements collected truly reflected the actual "temperature of the test medium or pipe" during the required hydrostatic tests.

Enterprise must revise its procedures to ensure that future hydrostatic tests collect temperature information that better reflects the temperature of the water in the pipe and not ambient temperatures.

Response to this Notice

This Notice is provided pursuant to 49 U.S.C. § 60108(a) and 49 C.F.R. § 190.237. Enclosed as part of this Notice is a document entitled *Response Options for Pipeline Operators in Compliance Proceedings*. Please refer to this document and note the response options. Be advised that all material you submit in response to this enforcement action is subject to being made publicly available. If you believe that any portion of your responsive material qualifies for confidential treatment under 5 U.S.C. 552(b), along with the complete original document you must provide a second copy of the document with the portions you believe qualify for confidential treatment redacted and an explanation of why you believe the redacted information qualifies for confidential treatment under 5 U.S.C. 552(b). If you do not respond within 30 days of receipt of this Notice, this constitutes a waiver of your right to contest the allegations in this Notice and authorizes the Associate Administrator for Pipeline Safety to find facts as alleged in this Notice without further notice to you and to issue a Final Order.

If, after opportunity for a hearing, your plans or procedures are found inadequate as alleged in this Notice, you may be ordered to amend your plans or procedures to correct the inadequacies (49 C.F.R. § 190.237). If you are not contesting this Notice, we propose that you submit your amended procedures to my office within 30 days of receipt of this Notice. This period may be extended by written request for good cause. Once the inadequacies identified herein have been addressed in your amended procedures, this enforcement action will be closed.

It is requested (not mandated) that Enterprise maintain documentation of the safety improvement costs associated with fulfilling this Notice of Amendment (preparation/revision of plans, procedures) and submit the total to R. M. Seeley, Director, Southwest Region, Pipeline and Hazardous Materials Safety Administration. In correspondence concerning this matter, please refer to **CPF 4-2012-5025M** and, for each document you submit, please provide a copy in electronic format whenever possible.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. M. Seeley".

R. M. Seeley
Director, Southwest Region
Pipeline and Hazardous Materials Safety Administration

Enclosure: *Response Options for Pipeline Operators in Compliance Proceedings*